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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
MOTION FOR LEAVE TO AMEND  
INVALIDITY CONTENTIONS  
PURSUANT TO PATENT L.R. 3-6**

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28 CASE No. 3:20-cv-06754-WHA

DECLARATION OF NIMA HEFAZI IN SUPPORT OF GOOGLE'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS MOTION FOR LEAVE TO AMEND INVALIDITY  
CONTENTIONS

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative  
5 Motion to File Under Seal Portions of its Motion for Leave to Amend Invalidity Contentions Pursuant  
6 to Patent L.R. 3-6 (“Google’s Administrative Motion”). If called as a witness, I could and would  
7 testify competently to the information contained herein.

8 2. Google’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Nima Hefazi in Support of Google’s Motion for Leave to Amend Invalidity Contentions Pursuant to Patent L.R. 3-6 (“Exhibit 1”)	Portions outlined in blue boxes	Google

13 3. The portions of Exhibit 1 outlined in blue boxes detail the operation and system design  
14 of functionalities of the YouTube Remote application and system, including the source code for the  
15 YouTube Remote. This document contains highly confidential and proprietary information regarding  
16 sensitive features of Google’s product and system designs. The specifics of how these functionalities  
17 operate is confidential information that Google does not share publicly. Public disclosure of such  
18 information could lead to competitive harm to Google as competitors may alter their systems and  
19 practices relating to competing products. Thus, Google has good cause to seal the portions of Exhibit  
20 1 outlined in blue boxes. A less restrictive alternative than sealing this document would not be  
21 sufficient because the information sought to be sealed is Google’s proprietary and confidential  
22 business information—including source code—but is necessary to the argument in Google’s Motion  
23 for leave to Amend Invalidity Contentions Pursuant to Patent L.R. 3-6.

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1 I declare under penalty of perjury that to the best of my knowledge the foregoing is true and  
2 correct. Executed on August 30, 2022, in Los Angeles, California.

3 DATED: August 30, 2022

4 By: /s/ Nima Hefazi  
5 Nima Hefazi  
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**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: August 30, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven